

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

Brock Fredin,

Plaintiff,

v.

Jamie Kreil,

Defendant.

Case No. 0:20-cv-01929-SRN-HB

**MOTION REGARDING CONTINUED SEALING
OF DOCUMENTS PURSUANT TO LOCAL RULE 5.6**

Jamie Kreil submits as follows under Local Rule 5.6 relating to documents temporarily filed under seal in connection with Kreil's Emergency Motion for Terminating Sanctions, a Temporary Restraining Order, and Attorneys' Fees [Docket No. 15]. Kreil requested Brock Fredin's position on continued sealing of the documents at issue but Fredin did not respond, despite Kreil's notice that she would file the instant Motion by close of business today (the deadline to file).

The following documents were filed under temporary seal:

Sealed Docket Number	Redacted Docket Number	Document Description	Precisely Identify Information: <ul style="list-style-type: none"> • That the parties agree should remain sealed; • The parties agree should be unsealed; • About which the parties disagree. 	Reason Why Document Should Remain Sealed or Be Unsealed
19	N/A	Ex. A to Declaration of Anne M. Lockner: Pdf version of website currently hosted at “annelockner.com” and www.annelockner.attorneypetermayer.com”	<p>Kreil takes the position that the document should remain sealed.</p> <p>Fredin did not respond by the deadline to file this Motion, and thus Kreil is unaware of Fredin’s position on continued sealing.</p>	Kreil states that the document should remain sealed because (as the Court has found) Fredin created it in an effort to harass and intimidate counsel and the Court, and the Court has ordered Fredin to remove the document from the internet. <i>See</i> Order (Dkt. 39). The prejudicial effect of preserving it in the public record here outweighs the public interest in accessing it.
19-1	N/A	Ex. B to Declaration of Anne M. Lockner: Pdf version of website currently hosted at “enakovacevic.com” and www.enakovacevic.attorneypetermayer.com”	<p>Kreil takes the position that the document should remain sealed.</p> <p>Fredin did not respond by the deadline to file this Motion, and thus Kreil is unaware of Fredin’s position on continued sealing.</p>	Kreil states that the document should remain sealed because (as the Court has found) Fredin created it in an effort to harass and intimidate counsel and the Court, and the Court has ordered Fredin to remove the

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				document from the internet. <i>See</i> Order (Dkt. 39). The prejudicial effect of preserving it in the public record here outweighs the public interest in accessing it.
19-2	N/A	Ex. C to Declaration of Anne M. Lockner: Pdf version of website currently hosted at "hayneshansen.net"	<p>Kreil takes the position that the document should remain sealed.</p> <p>Fredin did not respond by the deadline to file this Motion, and thus Kreil is unaware of Fredin's position on continued sealing.</p>	Kreil states that the document should remain sealed because (as the Court has found) Fredin created it in an effort to harass and intimidate counsel and the Court, and the Court has ordered Fredin to remove the document from the internet. <i>See</i> Order (Dkt. 39). The prejudicial effect of preserving it in the public record here outweighs the public interest in accessing it.

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19-3	N/A	Ex. D to Declaration of Anne M. Lockner: Pdf image of video currently hosted at https://youtu.be/tdyWcPA5k0I	<p>Kreil takes the position that the document should remain sealed.</p> <p>Fredin did not respond by the deadline to file this Motion, and thus Kreil is unaware of Fredin's position on continued sealing.</p>	<p>Kreil states that the document should remain sealed because (as the Court has found) Fredin created it in an effort to harass and intimidate counsel and the Court, and the Court has ordered Fredin to remove the document from the internet. <i>See</i> Order (Dkt. 39). The prejudicial effect of preserving it in the public record here outweighs the public interest in accessing it.</p>
19-4	N/A	Ex. E to Declaration of Anne M. Lockner: Pdf image of video currently hosted at https://youtu.be/IUGyNosr974	<p>Kreil takes the position that the document should remain sealed.</p> <p>Fredin did not respond by the deadline to file this Motion, and thus Kreil is unaware of Fredin's position on continued sealing.</p>	<p>Kreil states that the document should remain sealed because (as the Court has found) Fredin created it in an effort to harass and intimidate counsel and the Court, and the Court has ordered Fredin to remove the</p>

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				document from the internet. <i>See</i> Order (Dkt. 39). The prejudicial effect of preserving it in the public record here outweighs the public interest in accessing it.
19-5	N/A	Ex. F to Declaration of Anne M. Lockner: Pdf image of video currently hosted at https://youtu.be/LNOTm082pS8	<p>Kreil takes the position that the document should remain sealed.</p> <p>Fredin did not respond by the deadline to file this Motion, and thus Kreil is unaware of Fredin's position on continued sealing.</p>	Kreil states that the document should remain sealed because (as the Court has found) Fredin created it in an effort to harass and intimidate counsel and the Court, and the Court has ordered Fredin to remove the document from the internet. <i>See</i> Order (Dkt. 39). The prejudicial effect of preserving it in the public record here outweighs the public interest in accessing it.

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23-1	N/A	Ex. G to Second Declaration of Anne M. Lockner: Thumb drive containing electronically archived versions of Ex. D, E, and F (to original Lockner Declaration)	<p>Kreil takes the position that the document should remain sealed.</p> <p>Fredin did not respond by the deadline to file this Motion, and thus Kreil is unaware of Fredin's position on continued sealing.</p>	<p>Kreil states that the document should remain sealed because (as the Court has found) Fredin created it in an effort to harass and intimidate counsel and the Court, and the Court has ordered Fredin to remove the document from the internet. <i>See</i> Order (Dkt. 39). The prejudicial effect of preserving it in the public record here outweighs the public interest in accessing it.</p>
34	N/A	Ex. A to Third Declaration of Anne M. Lockner: Pdf image of video currently hosted at https://youtu.be/2ydfF2vm4MY	<p>Kreil takes the position that the document should remain sealed.</p> <p>Fredin did not respond by the deadline to file this Motion, and thus Kreil is unaware of Fredin's position on continued sealing.</p>	<p>Kreil states that the document should remain sealed because (as the Court has found) Fredin created it in an effort to harass and intimidate counsel and the Court, and the Court has ordered Fredin to remove the</p>

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				document from the internet. <i>See</i> Order (Dkt. 39). The prejudicial effect of preserving it in the public record here outweighs the public interest in accessing it.
34-1	N/A	Ex. B to Third Declaration of Anne M. Lockner: Pdf image of video currently hosted at https://youtube.com/watch?v=QFVYNQnlecg	<p>Kreil takes the position that the document should remain sealed.</p> <p>Fredin did not respond by the deadline to file this Motion, and thus Kreil is unaware of Fredin's position on continued sealing.</p>	Kreil states that the document should remain sealed because (as the Court has found) Fredin created it in an effort to harass and intimidate counsel and the Court, and the Court has ordered Fredin to remove the document from the internet. <i>See</i> Order (Dkt. 39). The prejudicial effect of preserving it in the public record here outweighs the public interest in accessing it.

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34-2	N/A	Ex. C to Third Declaration of Anne M. Lockner: Pdf image of video currently hosted at https://youtube.com/watch?v=8OKrqkvOCZM	<p>Kreil takes the position that the document should remain sealed.</p> <p>Fredin did not respond by the deadline to file this Motion, and thus Kreil is unaware of Fredin's position on continued sealing.</p>	<p>Kreil states that the document should remain sealed because (as the Court has found) Fredin created it in an effort to harass and intimidate counsel and the Court, and the Court has ordered Fredin to remove the document from the internet. <i>See</i> Order (Dkt. 39). The prejudicial effect of preserving it in the public record here outweighs the public interest in accessing it.</p>
34-3	N/A	Ex. D to Third Declaration of Anne M. Lockner: Pdf image of video currently hosted at https://www.youtube.com/watch?v=_JSkH5r52ao	<p>Kreil takes the position that the document should remain sealed.</p> <p>Fredin did not respond by the deadline to file this Motion, and thus Kreil is unaware of Fredin's position on continued sealing.</p>	<p>Kreil states that the document should remain sealed because (as the Court has found) Fredin created it in an effort to harass and intimidate counsel and the Court, and the Court has ordered Fredin to remove the</p>

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				document from the internet. <i>See</i> Order (Dkt. 39). The prejudicial effect of preserving it in the public record here outweighs the public interest in accessing it.
36-1	N/A	Ex. A to Fourth Declaration of Anne M. Lockner: Thumb drive containing electronically archived versions of Ex. A, B, C, and D (to Third Lockner Declaration)	<p>Kreil takes the position that the document should remain sealed.</p> <p>Fredin did not respond by the deadline to file this Motion, and thus Kreil is unaware of Fredin's position on continued sealing.</p>	Kreil states that the document should remain sealed because (as the Court has found) Fredin created it in an effort to harass and intimidate counsel and the Court, and the Court has ordered Fredin to remove the document from the internet. <i>See</i> Order (Dkt. 39). The prejudicial effect of preserving it in the public record here outweighs the public interest in accessing it.

Dated: December 3, 2020

ROBINS KAPLAN LLP

By: /s/ Anne M. Lockner

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